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May 1, 2015

Honorable Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007
Fax: 212-805-7942

RE: United States v. Daniel Barrera Barrera, *et als.*
Criminal Docket No. 07 CR 862 (AKH)

Dear Judge Hellerstein:

The above referenced matter is scheduled for a sentencing hearing on May 14th, 2015 at 10:00 A.M. The defendant would respectfully request that this hearing be adjourned for thirty to sixty days. First, undersigned counsel continues to move forward with his preparation for the sentencing but additional time will be necessary. Second, the PSR interview has now been conducted but the report itself has not been issued. Third, the Southern District of Florida has made the fortunate decision to transfer its case to this district as well (along with the EDNY case which has already been transferred and consolidated before this Honorable Court). However, the transfer has not yet been completed. Once transferred the Defendant will still need to plead guilty to that indictment and the PSR will have to be revised. Accordingly, the request for adjournment is necessary and not for the sake of delay. Undersigned counsel has conferred with Assistant United States Attorney, Andrea Surratt, Esq. who does not object to the relief requested herein.

Therefore, the defendant would respectfully request a thirty to sixty day adjournment from the currently scheduled date.

Respectfully submitted,

Ruben Oliva, Esq.

cc: Andrea Surratt, AUSA
Ross Kapitansky, USPO